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June 28, 2019

BY ECF

Honorable Katharine H. Parker United States Magistrate Judge Southern District of New York 500 Pearl Street, Suite 1950 New York, New York 10007

Re: City of Almaty, Kazakhstan, et ano. v. Mukhtar Ablyazov, et al.,

Case No. 15 Civ. 5345 (AJN) (KHP)

City of Almaty, Kazakhstan, et ano. v. Felix Sater, et al.,

Case No. 19 Civ. 2645 (AJN) (KHP)

Dear Judge Parker:

We represent the City of Almaty, Kazakhstan and BTA Bank (the "Kazakh Entities") and write to update the Court regarding a means of sharing discovery from the *Ablyazov* matter in the *Sater* matter. As required under the Court's June 6, 2019 Order, the parties have continued to confer regarding the overlap of discovery between the two cases and discussed the form of proposed orders that would allow for shared discovery. [*See* Case No. 19 Civ. 2645, ECF No. 41 at 3.]

As reflected in the two recent extension requests on the deadline to propose a protective order [see Case No. 19 Civ. 2645, ECF No. 45], the parties made substantial progress in reaching a joint proposal but are still discussing certain details. No final agreement has been reached.

Respectfully,

/s/ Craig Wenner

Craig Wenner